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 Company, LLC*

**UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA**

Millennium Drilling Co., Inc., a Delaware  
 Corporation,

Plaintiff,

vs.

Beverly House-Meyers Revocable Trust,  
 Beverly House-Meyers, Trustee; Grace Mae  
 Properties, LLC; Hamrick Trust, Robert H.  
 Hamrick and Molly Kay Hamrick, Trustees;  
 DOES I through X; and ROES I through X,

Defendants.

Molly Hamrick, Beverly House-Myers, R&M  
 Hamrick Family Trust;

Third-Party Plaintiffs,

CASE NO.: 2:12-cv-00462-MMD-CWH  
 (Base case)

**STIPULATION AND [PROPOSED]  
 ORDER TO EXTEND DEADLINE TO  
 FILE REPLIES**

**(First Request)**

CASE NO.: 2:13-cv-00078-MMD-CWH  
 (Consolidated Case)

1 vs.

2 Jonathan Feldman, Montcalm, LLC, Patriot  
3 Exploration Company, LLC, Carter Henson,  
4 Jr., Matthew Barnes, Robert Holt, Elizabeth  
Holt, and Schain, Leifer, Guralnick,

5 Third-Party Defendants.

6  
7 Third-Party Defendants JONATHAN FELDMAN (“Feldman”), CARTER HENSON,  
8 JR. (“Henson”), and PATRIOT EXPLORATION COMPANY, LLC (“Patriot”) (collectively,  
9 the “Patriot Defendants”), Plaintiff MILLENNIUM DRILLING CO., Inc. (“Millennium”) and  
10 Third-Party Plaintiffs/Defendants MOLLY HAMRICK, BEVERLY HOUSE-MYERS,  
11 BEVERLY HOUSE-MYERS REVOCABLE TRUST, GRACE MAE PROPERTIES, LLC,  
12 HAMRICK TRUST, ROBERT H. HAMRICK and R&M HAMRICK FAMILY TRUST  
13 (collectively, the “Third-Party Plaintiffs”), by and through their respective undersigned counsel,  
14 stipulate on the following and request an Order from this Court granting such stipulation:

15 1. On March 30, 2015, the Third-Party Plaintiffs filed their Points and Authorities  
16 in Response to Third-Party Defendants Jonathan Feldman and Patriot Exploration Company’s  
17 Omnibus Motion Re: (1) Partial Summary Judgment – Statute of Limitations; (2) Summary  
18 Judgment for Res Judicata or Collateral Estoppel; and (3) Summary Judgment on Third-Party  
19 Plaintiffs’ Claims for (1) Breach of Fiduciary Duty; (2) Breach of Contract; (3) Imposition of  
20 Constructive Trust; (4) Unjust Enrichment; and (5) Money Had and Received. (Dkt. No. 214).

21 2. Additionally, on March 30, 2015, the Third-Party Plaintiffs filed their Points and  
22 Authorities in Response to Third-Party Defendant Carter Henson’s Motion to Dismiss for Lack  
23 of Personal Jurisdiction (Dkt. No. 215).

24 3. The Patriot Defendants’ Replies for the above-referenced Motions are due on  
25 April 16, 2015.

26 4. This is the Patriot Defendants’ first request for entry of an agreed stipulation  
27 extending the Reply deadlines for the above-referenced Motions.  
28

5. Having discussed between counsel for the Third-Party Plaintiffs and the Patriot Defendants, all parties are in agreement to extend the Patriot Defendants' deadline to file their Replies to the above-referenced Motions to April 28, 2015.

6. IT IS HEREBY STIPULATED AND AGREED that the deadlines for the Patriot Defendants' Replies to the above-referenced Motions are extended from April 16, 2015 to April 28, 2015.

**HOWARD & HOWARD ATTORNEYS  
PLLC**

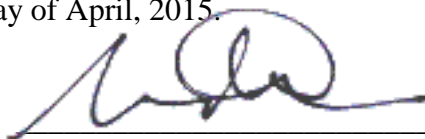
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Defendants*

**ORDER**

**IT IS SO ORDERED** this 15th day of April, 2015.



**UNITED STATES DISTRICT COURT JUDGE**

Respectfully submitted by:

**HOWARD & HOWARD ATTORNEYS PLLC**

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